

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft permit, No. V-03-033
LG&E COMPANY - Natural Gas Compressor Station
Magnolia, Kentucky 42757
January 9, 2004
Herbert R. Campbell, Reviewer
Plant I.D. 21-123-00012
Application Log # 55402

SOURCE DESCRIPTION, CONTROL EQUIPMENT & CONSTRUCTION DATE:

- E. Unit 01: Unit 01: (03) -Two Natural Gas Purification Plants controlled by a Hydrogen Sulfide (H₂S) Afterburner-Plant #1 before 1960, and Plant #2 before 1965
- E. Unit 03: Unit 03: (07, 08, 11) - Three Natural Gas Fired Compressor Units-before 1964
- E. Unit 04: Unit 04: (09, 10, 12) - Three Natural Gas Fired Compressor Units-before 1972
- E. Unit 05 Unit 05: (13) - Standby Generator-before 1999
- E. Unit 06 Unit 06 (14) - Standby Generator-before 1987

REGULATION APPLICABILITY:

Due to the age of this facility, the conditions that apply are the following:

1) 401KAR 50:012 Sec.1(2). In the absence of a standard specified in these administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available and practical.

2) the General Conditions and historically the three natural gas-fired compressors at Unit 3 were subject to requirements of 401 KAR 63:021.

The following regulations are not applicable based on the applicability definition of an affected facility per the regulation:

40 CFR 63, Subpart HH – National Emission Standards for Hazardous Air Pollutants (HAPs) from Oil and Natural Gas Production Facilities

The facility is **not a major source for HAPs** as defined in section 63.761. The maximum potential for HAPs is well below 10 tons/year for a single HAP and 25 tons/year of total HAPs.

STATEMENT OF BASIS

PAGE TWO

40 CFR 63, Subpart HHH – National Emission Standards for HAPs from Natural Gas Transmission and Storage Facilities

This facility is **not a major source for HAPs** as defined in section 63.1271. The maximum potential for HAPs is well below 10 tons/year for a single HAP and 25 tons/year of total HAPs.

40 CFR 60, Subpart LLL –Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions does not apply due to date of construction

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.